

The Honorable PAUL B. SNYDER
Hearing Date: May 7, 2015
Hearing Time: 9:00 a.m.
Response Date: April 30, 2015
Chapter 7 Proceeding
Tacoma, Washington

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA**

In Re:

SILVERLAKE HIGHLANDS, LLC,

Debtor,

Bankruptcy Case No.: 12-48192

MOTION TO SELL REAL PROPERTY
PURSUANT TO 11 USC 363(b) (1) &
(f)

COMES NOW, the Trustee, Mark D. Waldron, by and through his attorneys, ORLANDINI & WALDRON, PS, and moves this Court for an Order Approving the sale of real property of the estate. Pursuant to 11 USC §363(b)(1)&(f), you and each of you are hereby notified that unless objection is made, filed, and served on the Trustee on or before the date listed above, the Trustee of the above-entitled estate, MARK D. WALDRON, by and through his attorneys, ORLANDINI & WALDRON, P.S., intends to sell certain real property of the Debtor's estate.

I. SALE OF LOTS 1, 2 & 3

1. The Trustee will proceed to sell Lots 1, 2 and 3 of the real property of the debtor's estate located in Pierce County, Washington and legally described as follows:

LAW OFFICES
ORLANDINI & WALDRON
A Professional Services Corporation
6711 Regents Blvd. W.
Tacoma, WA 98466
Telephone: 253.565.5800
Fax: 253.564.2998
website: orlandini-waldron.com
email: mark@orlandini-waldron.com

Tax account Nos: 0316114017, 0316114018 and 0316114019

II. SALE OF LOT 6

Lot 6 as shown on that certain Large Lot Parcel Map entitled NISQUALLY-TANWAX CREEK recorded April 3, 1997, under Pierce County Auditor's No. 9704030428, said Tracts being a portion of the South half of Section 11, Township 16 North, Range 3 East of W.M., records of Pierce County, Washington.

Tax account No: 0316113003

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1 pay the real estate taxes which are due at closing. This sale shall be conveyed to JASON
2 BRIGGS, or the highest buyer, free and clear of all liens, claims of creditors, and
3 encumbrances, with liens and encumbrances attaching to proceeds.

4 5. These sales are subject to the several Purchase and Sale Agreements signed
5 between the parties. This Notice does not contain all terms of the sale.

6 6. The Trustee believes that these sales are in the best interest of the estate and
7 its creditors. The properties are sold as is and where is. The Trustee makes no
8 representations or warranties herein and the sales are without recourse against said
9 Trustee, either individually or as Trustee.

10 7. This Chapter 7 proceeding is a related or companion case to Ismail Arslangiray
11 Chapter 11, No. 11-42290. Mark D. Waldron is the appointed Plan Administrator pursuant
12 to the confirmed Chapter 11 plan. Other than the administrative expenses and the debt
13 owing to Pierce County for unpaid real property taxes, there are no other creditors of
14 Silverlake Highlands, LLC. Mark D. Waldron as Plan Administrator did file a Proof of Claim
15 in this Chapter 7 on behalf of the Chapter 11 Estate of Arslangiray. Eventually all
16 available proceeds for distribution to unsecured creditors or equity creditors will be paid to
17 the Arslangiray Chapter 11 proceeding. Additionally, the above proposed sales are the last
18 remaining lots left in this debtor's estate. Once these lots are closed, the Trustee can
19 proceed to closing this estate and distribute funds to the Chapter 11 estate.

20 8. The Trustee has executed a listing agreement with Neil Walter and has agreed
21 to pay a 5% commission on the gross sales price, divided between the listing and selling
22 broker. The Trustee does hereby request authority to pay the same at closing.

23 9. The Trustee requests authority to pay, at closing from proceeds of the sale any
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1 costs of sale, including commissions, escrow fees, title insurance, real property taxes and
2 the like.

3 DATED this 30th day of March, 2015.

4 ORLANDINI & WALDRON, P.S.

5
6 /s/ Mark D. Waldron
7 MARK D. WALDRON (WSBA #9578)
8 Attorney for Trustee
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